## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHRISTOS SOUROVELIS, et al.,

Plaintiffs,

VS.

CITY OF PHILADELPHIA, et al.,

Defendants.

Civil Action No. 2:14-cv-04687-ER

Assigned to the Honorable Judge Robreno

**Special Management Track** 

## PLAINTIFFS' MOTION THAT THE OCTOBER 14 HEARING REGARDING FINAL APPROVAL BE CONDUCTED VIA ELECTRONIC/REMOTE MEANS

Under Federal Rule of Civil Procedure 7 and Local Rule 7.1, Named Plaintiffs Christos Sourovelis, Doila Welch, Norys Hernandez, and Nassir Geiger respectfully move this Court for an order to modify the in-person hearing, currently scheduled for October 14, 2020 at 10:00 a.m., into a hearing that will be conducted via electronic/remote means.

This motion is not uncontested by Defendants. Plaintiffs have therefore included a memorandum with this motion in accordance with Local Rule 7.1(c) and (d).

Dated: October 5, 2020

Respectfully submitted,

INSTITUTE FOR JUSTICE

By: <u>/s/ **Robert Frommer**</u>

Robert P. Frommer\*
Robert Peccola\*

901 North Glebe Road, Suite 900

Arlington, VA 22203

Email: dsheth@ij.org; memam@ij.org

Tel: (703) 682-9320 Fax: (703) 682-9321

\*Admitted Pro Hac Vice

KAIRYS, RUDOVSKY, MESSING, FEINBERG & LIN

David Rudovsky (I.D. Number 15168)

The Cast Iron Building

718 Arch Street

Suite 501 South Philadelphia, PA 19106

Email: drudovsky@krlawphila.com

Tel: (215) 925-4400

Fax: (215) 925-5365

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5th day of October, 2020, a true and correct copy of Plaintiffs' Motion That The October 14 Hearing Regarding Final Approval Be Conducted Via Electronic/Remote Means was served upon the following counsel of record via the ECF system:

Anne Taylor Mark V. Maguire City of Philadelphia Law Department 1515 Arch Street, 14th Floor Philadelphia, PA 19102

Tel: (215) 683-5381

Email: anne.taylor@phila.gov; mark.maguire@phila.gov

Counsel for Defendants City of Philadelphia, Mayor James F. Kenney, and Police Commissioner Danielle Outlaw

Nancy Winkelman Simran Dhillon Benjamin T. Jackal Three South Penn Square Philadelphia, PA 19107 Tel: (215) 686-8064

Email: nancy.winkelman@phila.gov; simran.g.dhillon@phila.gov;

benjamin.jackal@phila.gov

Counsel for Defendants Philadelphia District Attorney's Office and District Attorney Lawrence S. Krasner

Michael Daley 1515 Market Street, Suite 1414 Philadelphia, PA 19102 Tel: (215) 560-6300

Email: legaldepartment@pacourts.us

Attorneys for Defendants the Honorable Idee C. Fox, the Honorable Jacqueline F. Allen, Joseph H. Evers, and Charles A. Mapp

Additionally, I HEREBY CERTIFY that on this 5th day of October, 2020, a true and correct copy of the foregoing was served upon the following via first class mail:

Min. Anthony Tony McNeil Sr. P.O. Box 676 Trenton, NJ 08604

Universal Co-Op Membership, Inc. C/O Anthony McNeil Sr. P.O. Box 676 Trenton, NJ 08064

Darien Houser G1-7509 175 Progress Drive Sci Greene Waynesburg, PA 15370

Gary Kimmelman 9331(A) Neil Road Philadelphia, PA 19115

Kevin Betha 915 Belmount Avenue Philadelphia, PA 19104

Luis A Oyole 4305A Rhawn Street Philadelphia, PA 19136 Charles Worrell 4730 Oakland Street Philadelphia, PA 19124

Gregory Giles 1533 Lindberg Avenue Roslyn, PA 19001

Margaret Helen Bigelow 5234 Chancellor Street Philadelphia, PA 19139

Leeza Enriquez 1355 Sellers Street Philadelphia, PA 19124

Mateo Jimenez 983 North 6th Street, Unit 2 Philadelphia, PA 19123

Lutfiyyah Al-Amin 1661 Latona Street Philadelphia, PA 19146

Charles Talbert QAY727 SCI – Phoenix 1200 Mokychic Drive Collegeville, PA 19426

By: /s/ Robert P. Frommer

Robert P. Frommer

Lead Counsel for Plaintiffs